

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
UNITED STATES OF AMERICA

-v-

MICHAEL AVENATTI,

Defendant.

:
: 19-CR-374-1 (JMF)
:

:
: AFFIDAVIT OF CLARK
: O. BREWSTER IN
: SUPPORT OF MOTION
: TO ADMIT COUNSEL
: PRO HAC VICE
:-----X

State of Oklahoma)
) ss:
County of Tulsa)


Clark O. Brewster, being duly sworn, hereby deposes and says as follows:

1. I am the principal and managing attorney of Brewster & DeAngelis, PLLC, a law firm in Tulsa, Oklahoma.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. I am a member in good standing of the bar of the State of Oklahoma. I have requested an updated Certificate of Good Standing and have been informed that we should be receiving it today or tomorrow. I have attached my most recent Certificate of Good Standing [See Exhibit 1] from the State of Oklahoma which was issued on December 15, 2021. I will supplement with a more recent CGS as soon as it is received from the Bar Association.
4. Affiant is also a member in good standing of the bar in the State of Texas. [See Exhibit 2].
5. Further, your affiant shows the Court that he has been admitted *pro hac vice* to federal, state and/or administrative courts in FL, CA, AZ, NM, CO, MO, OH, AR, HI, KS, IA, MN, WI, MI, IL, KY, NJ, NY, MD, WA, OR, ID, DE and the Eastern District of New York; has

served as lead counsel in excess of seventy-five (75) jury trials; and made innumerable other appearances before these and other courts.

6. There are no pending disciplinary proceedings against me in any State or Federal court.
7. *I have not* been convicted of a felony.
8. *I have not* been censured, suspended, disbarred or denied admission or readmission by any court.
9. Your affiant is longstanding personal counsel to Interested Party, Stephanie Clifford, who has been served a subpoena by Defendant Avenatti. Ms. Clifford seeks to challenge the manner and scope of Mr. Avenatti's subpoena because Ms. Clifford contends that it does not comply with the strictures of Fed. R. Crim. P. 17.
10. Your affiant is also the subject of another of Mr. Avenatti's subpoenas in his personal capacity. Just as his client Ms. Clifford, your affiant also seeks to challenge the subpoena to him because he contends that it does not comply with Fed. R. Crim. P. 17 in several respects and is oppressive and burdensome.
11. Therefore, your affiant respectfully requests that he be permitted to appear as counsel and advocate *pro hac vice* in this case for himself and Interested Party, Stephanie Clifford, for the purpose of challenging the validity of the subpoenas from Defendant Avenatti.
12. I state under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: January 18, 2022

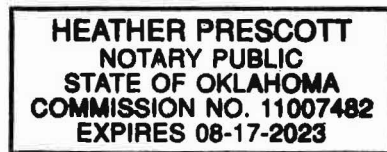


Clark O. Brewster, OBA #1114
Brewster & DeAngelis, PLLC
2617 East 21st Street

Tulsa, OK 74114
cbrewster@brewsterlaw.com
Phone: (918) 742-2021
Fax: (918) 742-2197

State of Oklahoma)
) ss:
County of Tulsa)

This instrument was acknowledged before me on this 18th day of January, 2022 by Clark O. Brewster.




Notary Public

(S E A L)

My Commission Expires:

8-17-23